

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ALEXANDER STYLLER, INTEGRATED
COMMUNICATIONS & TECHNOLOGIES,
INC., JADE CHENG, JASON YUYI, CATHY
YU, CAROLINE MARAFEO CHENG,
PUSHUN CHENG, CHANGZHEN NI,
JUNFANG YU, MEIXIANG CHENG,
FANGSHOU YU, and CHANGHUA NI,

Plaintiffs,

vs.

HEWLETT-PACKARD FINANCIAL
SERVICES COMPANY, HEWLETT-
PACKARD FINANCIAL SERVICES (INDIA)
PRIVATE LIMITED, HP INC., HEWLETT
PACKARD ENTERPRISE COMPANY, and
DAVID GILL

Defendants.

Civil Action No. 1:16-CV-10386 (LTS)

PLAINTIFFS' MOTION FOR EXTENSION OF TIME

Pursuant to Federal Rule of Civil Procedure 7(b) and Local Rule 7.1, Plaintiffs, by and through their undersigned counsel, respectfully move the Court to extend their time to oppose Defendants' motion for spoliation currently due on April 16, 2020, by two weeks to April 30, 2020.

At the March 10, 2020 Conference, the Court set the due date of April 16, 2020 for Plaintiffs' oppositions to Defendants' motion for partial summary judgment, their Daubert motion to exclude Plaintiffs' expert, and their motion for spoliation. ECF No. 313.

On March 20, 2020, the Governor of the State of New York issued the "New York State on Pause" executive order in response to the spread of coronavirus in the state. The pandemic and the public health emergency procedures mandated by the stay-at-home order

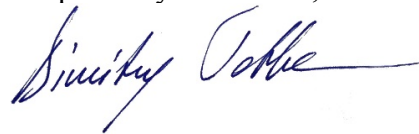
have caused significant unforeseen disruptions and delays in the daily lives of the state's residents, including the undersigned counsel for Plaintiffs. Accordingly, Plaintiffs respectfully seek a brief extension of time to respond to Defendants' motion for spoliation while keeping the current deadlines for the other filings.

Plaintiffs' counsel has conferred with Defendants' counsel electronically on April 10-12, and Defendants' counsel stated that "Defendants will not join your motion, but will also not oppose it if, in your application to the Court you state the following: 'In light of Plaintiffs' counsel's representation that he has been impacted by the pandemic and quarantine, Defendants do not object to Plaintiffs' motion for a two-week extension with respect to the briefing schedule for the motion for spoliation sanctions [ECF 320-22] only, but note for the Court that among the remedies sought on that motion are some that could impact Defendants' pending motion for partial summary judgment [ECF 315-17], which briefing schedule is not impacted by Plaintiffs' extension request.'"

WHEREFORE, Plaintiffs respectfully request the Court to grant their unopposed motion and extend the time for their opposition to Defendants' spoliation motion until April 30, 2020, and the time for Defendants' reply brief on the motion until May 14, 2020.

Dated: New York, New York
April 13, 2020

Respectfully Submitted,



Dimitry Joffe
Joffe Law P.C.
765 Amsterdam Avenue, 2C
New York, NY 10025
Tel: (917) 929-1964
Email: dimitry@joffe.law
Counsel to Plaintiffs

CERTIFICATE OF CONFERENCE

Pursuant to Local Civil Rule 7.1(a)(2), counsel for Plaintiffs certifies that he has electronically conferred with counsel for Defendants on April 10-12, 2020, and counsel for Defendants do not oppose this motion.

Dated: New York, New York
April 13, 2020

By: /s/ Dmitry Joffe
Dmitry Joffe
Counsel to Plaintiffs

CERTIFICATE OF SERVICE

I, Dmitry Joffe, counsel to Plaintiffs, hereby certify that Plaintiffs' Assented-To Motion to Extend Time was filed on April 13, 2020 using the CM/ECF system, and electronic notice thereof will be sent to the registered participants in this case.

/s/Dmitry Joffe

Dmitry Joffe

Counsel to Plaintiffs